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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ORACLE USA, INC.; a Colorado corporation;
 ORACLE AMERICA, INC.; a Delaware
 corporation; and ORACLE INTERNATIONAL
 CORPORATION, a California corporation,

Plaintiffs,

v.

RIMINI STREET, INC., a Nevada corporation;
 and SETH RAVIN, an individual,

Defendants.

Case No. 2:10-cv-0106-LRH-VCF

**DECLARATION OF BARBARA ANN
 FREDERIKSEN-CROSS IN
 SUPPORT OF ORACLE'S
 OPPOSITION TO RIMINI'S
 MOTION TO ENFORCE THE
 COURT'S ORDERS AND
 JUDGMENT SEPARATING *RIMINI I*
 FROM *RIMINI II***

DECLARATION OF BARBARA ANN FREDERIKSEN-CROSS IN SUPPORT OF ORACLE'S
 OPPOSITION TO RIMINI'S MOTION TO ENFORCE, ETC.

1 I, Barbara Ann Frederiksen-Cross, declare as follows:

2 1. I have been retained as an expert witness in this matter by Plaintiffs Oracle
3 International Corp. and Oracle America, Inc. ("Oracle"). I submit this Declaration to support
4 Oracle's Opposition to Rimini's Motion To Enforce The Court's Orders and Judgment Separating
5 *Rimini I* from *Rimini II*. I have personal knowledge of the facts set forth in this declaration, and
6 could testify competently to them if asked to do so.

7 2. I am the Director of Litigation Services for JurisLogic, LLC ("JurisLogic").
8 JurisLogic is an Oregon corporation that provides consulting services to computer hardware and
9 software manufacturers and computer-related technical assistance to the legal profession in the
10 United States, Canada, Japan, Singapore, and Europe. JurisLogic specializes in providing
11 consulting services to corporations and attorneys on intellectual property matters (such as
12 copyright and patent infringement matters, and misappropriation of trade secrets) and performing
13 assessments of computer software and Techno-archeology (the analysis of software development
14 projects). I have experience in the design, development, and analysis of computer software, and I
15 have previously provided both trial and deposition testimony as an expert for matters in state and
16 federal courts, authored a number of papers, and delivered lectures on technology to the legal
17 profession.

18 3. I have over forty-four (44) years of personal experience as a software developer
19 and consultant, including the development of web-based systems, and secure online data access
20 systems used by banks, insurance companies, hospitals, and telecommunication providers. I have
21 extensive experience in the design, implementation, and ongoing administration of databases and
22 multi-dimensional data aggregation systems, such as data marts and data warehouses used to
23 support business analysis.

24 4. I have been trained in forensic analysis of computer software in the specific
25 context of copyright infringement and trade secret analyses, and I have previously qualified as an
26 expert in state and federal courts to testify about the operation of computer software and computer
27 systems, including for matters that involve software copyright and trade secret disputes.

1 5. On January 31, 2020, I signed my "Post-Injunction Expert Report of Barbara Ann
2 Frederiksen-Cross," which I understand was submitted to Rimini Street, Inc. ("Rimini") as part of
3 discovery in this action.

4 6. I have reviewed Exhibit A to the Declaration of Eric Vandavelde, ECF No. 1326.
5 This exhibit contains excerpts from my January 31, 2020 Expert Report. Further, attached to this
6 declaration as Exhibit 1 are additional excerpts from my January 31, 2020 Expert Report.

7 7. For purposes of this Declaration, I hereby adopt and swear to these opinions set
8 forth in Exhibit A to the Declaration of Eric Vandavelde and Exhibit 1 to this declaration.

9 I declare under penalty of perjury under the laws of the United States of America that the
10 foregoing is true and correct and this declaration was executed on April 23, 2020 at Hubbard,
11 Oregon.

12
13 DATED: April 23, 2020

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16 Barbara Ann Frederiksen-Cross